

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

Mr. K. Perica
Monsanto Co. J. F. Queeny Plant
1700 South 2nd Street
St. Louis, MO 63177

RE: Request for Information

Monsanto Co. J. F. Queeny Plant
St. Louis
MOD004954111

REQUEST FOR INFORMATION

Dear Mr. Perica:

Under Section 3007 of the Resource Conservation and Recovery Act (RCRA), Title 42 U.S.C. Section 6927, the Environmental Protection Agency (EPA) may require you to furnish information relating to your wastes and waste management practices. Pursuant to Section 3007 of RCRA, for the purposes of determining compliance and possible enforcement, EPA hereby requires that you respond to the following questions in writing within fifteen (15) days of receipt of this letter.

Sections 3004 (d) through (k) and (m) and Section 3005 (j) of RCRA, 42 U.S.C. Section 6924 (d) through (k) and (m) and Section 6925 (j), require the EPA to ban, subject to limitations, or restrict the land disposal of hazardous waste. Prohibitions and restrictions on the management of wastes containing specified solvents became effective on November 7, 1986 (51 Federal Register pg. 40636; November 7, 1987). These prohibitions and restrictions are set forth in 40 CFR Part 268 and in revisions to 40 CFR 260 through 265 and 270.

Your facility has notified the EPA pursuant to the requirements of RCRA that you facility manages hazardous waste as either a generator, transporter, and/or treatment, storage, and disposal facility. These wastes are potentially affected by the new land ban regulations.

Definitions

"You" or "your" refers to your facility, including its officers, employees, and consultants.

A solvent is defined as a substance used to solubilize (dissolve) or mobilize other constituents. A solvent is considered "spent" when it has been used and is no longer fit for use without being regenerated, reclaimed, or otherwise reprocessed. Examples of spent solvents include solvents that are being used as degreasers, cleaners, fabric scourers, diluents, extractants, and reaction and synthesis media. Manufacturing process wastes containing solvents are not spent solvents.



R00105770
RCRA RECORDS CENTER

The definitions in RCRA and the RCRA regulations, 40 CFR Parts 260-271 apply.

Information Requested

1. The name of the person with your facility to contact regarding this request, including title, address, and telephone number.
2. State whether at any time after November 7, 1986, you generated, transported, treated, stored, and/or disposed of 1) F001, F002, F003, F004, and/or F005 wastes as defined at 40 CFR Part 261.31, and/or 2) D001 wastes as defined at 40 CFR 261.21, and/or 3) a mixture of any of the aforementioned wastes. If you are unable, based upon information immediately available to you, to determine the designation of your waste, provide information concerning solvent type wastes that you have generated or handled. Examples of solvent type wastes are given in the definitions section of this letter.
3. For each waste identified above, give the rate of generation in pounds per month (lbs./month).
4. For each waste identified above, please provide all chemical analyses, Material Safety Data Sheets, manufacturers information, and any other information used to characterize the waste.
5. For each waste identified above, provide a brief description of the generation, transportation, treatment, storage and/or disposal process(es).
6. For each waste identified above, provide information concerning how the waste was managed from the time the waste was generated or came into your possession up to its final disposition or the time the waste left your possession. This should include copies of all manifests, treatment standard notifications and certifications, servicing agreements, bills of lading, and invoices.

You may, if you desire, assert a business confidentiality claim covering part or all of the information submitted to, or reviewed by, EPA. Such a claim may be made by placing on (or attaching to) the information, at the time of its submittal to, or review by, EPA, a cover sheet, stamped or printed legend, or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential." Allegedly confidential portions of otherwise non-confidential documents should be clearly identified and may be submitted separately to facilitate identification and handling by EPA. If confidential treatment is sought only until a certain date or until the occurrence of a certain event, the request should so state.

Information submitted for which a claim of confidentiality is made will be disclosed by EPA only to the extent and by the means authorized by the procedures specified in 40 CFR Part 2, Subpart B (1985), as amended by 50 Federal Register 51654 December 18, 1985. If no such claim is made when information is received by EPA, the information may be made available to the public without further notice.

Please note that you are required to submit this information within fifteen (15) days of receipt of this letter. The response must be submitted to Jacobs Engineering Group Inc., a designated contractor to the EPA. Specifically, you should submit your response to :

Jacobs Engineering Group Inc.
Attn: Terry Hagen
8207 Melrose Drive, Suite 114
Lenexa, KS 66214

Should you require a longer period to respond to the information request, you may be granted, by EPA, a one-time extension of 15 days. To request an extension you must contact your EPA RCRA State Coordinator, Marc Rivas, at 913/236-2891.

Failure to respond to these questions within 15 days of receipt of this letter may subject you to an enforcement action under Section 3008 of RCRA, 42 U.S.C. Section 6928. Such enforcement action may include the assessment of penalties of up to \$25,000 for each day of noncompliance.

Should you have any questions concerning this matter, please contact Terry Hagen or Carla Rellergert at 913/492-9218.

Sincerely yours,

David A. Wagoner
Director
Waste Management Division

**UNITED STATES POSTAL SERVICE
OFFICIAL BUSINESS**

SENDER INSTRUCTIONS

Print your name, address, and ZIP Code in the space below.

- Complete items 1, 2, 3, and 4 on the reverse.
- Attach to front of article if space permits, otherwise affix to back of article.
- Endorse article "Return Receipt Requested" adjacent to number.



PENALTY FOR PRIVATE
USE, \$300

RETURN
TO

RECEIVED
REGION VII

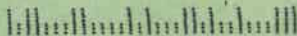
OCT 22 1987

Print Sender's name, address, and ZIP Code in the space below.

JACOBS ENGINEERING GROUP INC.

8207 Melrose Drive, Suite 114

Lenexa, KS 66214



● **SENDER:** Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.

Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☐ Show to whom delivered, date, and addressee's address. 2. ☐ Restricted Delivery.

3. Article Addressed to:

Mr. K. Perica
Monsanto Co. J.F. Queeny Plant
1700 South 2nd Street
St. Louis, MO 63177

4. Article Number

626 481 270

Type of Service:

☐ Registered
☒ Certified
☐ Express Mail

☐ Insured
☐ COD

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature — Addressee

X

6. Signature — Agent

X

7. Date of Delivery

OCT 20 1987

8. Addressee's Address (*ONLY if requested and fee paid*)